

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (DTS)

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,  
an Indiana corporation, and ACE  
AMERICAN INSURANCE COMPANY,  
a Pennsylvania corporation,

**DECLARATION OF LEAH  
GODESKY IN SUPPORT OF  
DEFENDANTS' MOTION FOR A  
NEW TRIAL ON ACTUAL  
DAMAGES**

Defendants.

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I, Leah Godesky, declare as follows:

1. I am an attorney at O'Melveny & Myers LLP and am one of the attorneys representing Defendants Federal Insurance Company and ACE American Insurance Company in this case.

2. Attached as **Exhibit 1** is a true and correct copy of an excerpt of the Neil Zoltowski deposition transcript taken on June 14, 2019.

3. Attached as **Exhibit 2** is a true and correct copy of an excerpt of the May 31, 2019, Reply Expert Report of Neil J. Zoltowski with Respect to Damages.

4. Attached as **Exhibit 3** is a true and correct copy of Fact Witness Presentation of Bill Waid.

5. Attached as **Exhibit D-0004** is a true and correct copy of Defendants Trial exhibit D-0004.

6. Attached as **Exhibit D-0012** is a true and correct copy of Defendants Trial exhibit D-0012.

7. Attached as **Exhibit D-0172** is a true and correct copy of Defendants Trial exhibit D-0172.

8. Attached as **Exhibit D-0276** is a true and correct copy of Defendants Trial exhibit D-0276.

9. Attached as **Exhibit D-0283** is a true and correct copy of Defendants Trial exhibit D-0283.

10. Attached as **Exhibit D-0284** is a true and correct copy of Defendants Trial exhibit D-0284.

11. Attached as **Exhibit D-0293** is a true and correct copy of Defendants Trial exhibit D-0293.

12. Attached as **Exhibit D-0343** is a true and correct copy of Defendants Trial exhibit D-0343.

13. Attached as **Exhibit J-001** is a true and correct copy of Joint Trial exhibit J-001.

14. Attached as **Exhibit P-0133** is a true and correct copy of Plaintiff's Trial exhibit P-0133.

15. Attached as **Exhibit P-0418** is a true and correct copy of Plaintiff's Trial exhibit P-0418.

16. Attached as **Exhibit P-0517** is a true and correct copy of Plaintiff's Trial exhibit P-0517.

17. Attached as **Exhibit P-0518** is a true and correct copy of Plaintiff's Trial exhibit P-0518.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: April 21, 2023

/s/ Leah Godesky

Leah Godesky